

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LOIDY TANG, individually	)	
and on behalf of a class,	)	11 C 2062
	)	
Plaintiff,	)	Judge Lefkow
	)	
v.	)	
	)	
DIVERSIFIED ADJUSTMENT SERVICES,	)	
INC.	)	
	)	
Defendant.	)	

**DEFENDANT'S FIRST MOTION TO EXTEND DISCOVERY**

NOW COMES Defendant DIVERSIFIED ADJUSTMENT SERVICES, INC., and pursuant to FRCP 6(b) moves to extend the due date for its responses to Plaintiff's First Set of Discovery Requests, and in support states the following:

1. This is Defendant's First motion to extend the due date for discovery responses.
2. Plaintiff served its First Set of Discovery Request on Defendant via email on October 25, 2011. See Ex. A. Pursuant to FRCP 6(d), an additional three days is added on to the time to respond. Accordingly, Defendant's Responses were due on or before Monday, November 28, 2011.
3. Defendant has been unable to comply with the original due date in light of work related travel related to New Jersey during the week of November 14, 2011 in the case of *Pesce vs. First Credit Services*, 11-cv-1379 (N.D. Ill.) which also a 30(b)(6) deposition and involved on-site document review. Additionally, during the past two weeks, the undersigned defense counsel has undertaken pre-suit discovery and/or responsive pleadings in the following cases: *Wade vs. Total Merchant Services*, 11-cv-7237 (N.D. Ill.); *Martin vs. Leading Edge*, 11-cv-5886 (N.D. Ill.); *Heathcote vs. Procter & Gamble*, 10-1441 (N.D. Ill.); and *Pollack vs. Morton Grove*

*Imaging*, 11-cv-7664. The undersigned defense counsel took the week of November 21, 2011, for a family vacation. Prior to that, defense counsel had to finalize a class based settlement for a fairness hearing which took place on November 21, 2011 in the case of *Chicago Chiropractic vs. Great Plains Lab.*, 10-cv-6151 (N.D. Ill.). Currently, defense counsel is preparing a response to class certification in *Jones vs. Glass Mountain*, 11-cv-3611 (N.D.Ill.). Finally, defense counsel is preparing a response to a complaint which is currently due tomorrow in the case of *Todd vs. State Collection Service*, 11-cv-7334 (N.D. Ill.). In light of these work and family commitments, defense counsel was unable to comply with the current discovery due date.

4. Accordingly, good cause exists to grant a short extension and no harm or prejudice will result to Plaintiff.

WHEREFORE, Defendant seeks and additional three weeks, until December 19, 2011, to respond to Plaintiff's discovery requests.

Respectfully submitted,

By: /s/James C. Vlahakis  
One of the Attorneys for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2011 I electronically filed the attached document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

By: s/ James C. Vlahakis  
One of the Attorneys for Defendant